STATE OF SO	UTH CAROLINA	.)	190905				
(Caption of Case) In Re: Kentucky Data Link, INc.			BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA				
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Submitted by:	Margaret M. Fox	, Esquire	SC Bar Number:	65418	PSC SC MAIL / DMS		
Address:	McNair Law Firn	n, P.A.	Гelephone:	803-799-980	0 MAIL / DIM		
	Post Office Box 1	13901	Fax:	803-753-321	9		
	Columbia, SC 29	211 (Other:				
			Email: <u>pfox@mc</u>	nair.net			
	This form is required for	ntained herein neither replaces r or use by the Public Service Con					
oe inica out comple		OCKETING INFOR	MATION				
DOCKETING INFORMATION (Check all that apply) Emergency Relief demanded in petition Request for item to be placed on Commission's Agenda expeditiously Other:							
INDUSTRY (Check one)		NATURE OF ACTION (Check all that apply)					
☐ Electric		Affidavit	Letter		Request		
☐ Electric/Gas		Agreement	☐ Memorandum		Request for Certification		
☐ Electric/Telecommunications		Answer	☐ Motion		Request for Investigation		
Electric/Water		Appellate Review	Objection		Resale Agreement		
Electric/Water/Telecom.		Application	Petition		Resale Amendment		
☐ Electric/Water/Sewer		Brief	Petition for Re	consideration	Reservation Letter		
Gas		Certificate	Petition for Ru	llemaking	Response		
Railroad		Comments	Petition for Rule	e to Show Cause	Response to Discovery		
Sewer		Complaint	Petition to Inte	ervene	Return to Petition		
☐ Telecommunications		Consent Order	Petition to Interv	vene Out of Time	Stipulation		
☐ Transportation		Discovery	Prefiled Testin	nony	Subpoena		
☐ Water		Exhibit	Promotion		☐ Tariff		
☐ Water/Sewer		Expedited Consideration	Proposed Orde	r			
Administrative Matter		Interconnection Agreement	Protest		- D Duke		
Other:		Interconnection Amendment	Publisher's Aff	idavit	O Duke		
		Late-Filed Exhibit	Report		Other: OK O Duke K O Ouke		

MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

11th Floor, Bank of America Tower Post Office Box 11390 1301 Gervais Street (29201) COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800 FACSIMILE (803) 376-2219

February 14, 2008

The Honorable Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211

Re: Application of Kentucky Data Link, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-based Local Exchange and Interchange Telecommunications Services in the State of South Carolina (SCPSC Docket No. 2008-16-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

Margaret ll. Fox

Enclosures

cc: John J. Pringle, Jr., Esquire Florence P. Belser, Esquire

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

BEFOR	E Z
THE PUBLIC SERVICE	COMMISSION OF
SOUTH CAR	OLINA SE TO
Docket No. 20	008-16-C
Re: Application of Kentucky Data Link, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-based Local Exchange and Interexchange Telecommunications Services in the State of South Carolina	PETITION TO INTERVENE

In response to the Commission's Notice of the Filing of the Application of Kentucky Data Link, Inc. for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
- SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
Sue-Ann Shannon Gerald
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: Margaritt

Attorneys for Intervenor South Carolina Telephone Coalition

February 14, 2008

Columbia. South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA



Docket No. 2008-16-C

Re:	Application of Kentucky Data Link, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-)))	CERTIFICATE OF
	based Local Exchange and Interexchange Telecommunications Services in the State of South Carolina)	SERVICE
)	

1. ElizaBeth A. Blitch, do hereby certify that 1 have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

John J. Pringle Jr., Esquire Ellis, Lawhorne & Sims, P.A. Post Office Box 2285 Columbia, South Carolina 29202

Florence P. Belser, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211.

> ElizaBoth A. Blitch, Paralegal McNair Law Firm, P.A. Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

February 14, 2008

Columbia, South Carolina